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Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Cellular Service and Other)
Commercial Mobile Radio Services)
in the Gulf of Mexico)
)
Amendment of Part 22 of the)
Commission's rules to Provide for)
Filing and Processing of Applications)
for Unserved Areas in the Cellular)
Service and to Modify Other Cellular)
Rules)

WT Docket No. 97-112

CC Docket No. 90-6

Reply Comments of ALLTEL Communications, Inc.

ALLTEL Communications, Inc.¹ ("ALLTEL") hereby submits its reply comments in the above-captioned proceeding.² In support thereof, the following is respectfully set forth.

In its comments, ALLTEL generally concurred with the Commission's proposal to divide the Gulf into two zones. Further, ALLTEL suggested that the rights of land-based

¹ ALLTEL Communications, Inc. is the corporate entity through which the various affiliates and subsidiaries of ALLTEL Corporation provide communications services on a competitive basis. The various affiliates and subsidiaries of ALLTEL Corporation which serve as FCC licensees currently remain intact for Commission licensing and reporting purposes. ALLTEL Mobile Communications, Inc. is the subsidiary of ALLTEL Corporation which, either directly or through various affiliates provides CMRS services to various markets, some of which abut the Gulf of Mexico (the "Gulf").

² The date for the filing of reply comments was extended to August 4, 1997 by Order, DA97-1143 (Released May 30, 1997) and the subsequent Erratum, dated June 19, 1997.

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licensees continue to be protected within their system's authorized CGSA and that the land-based licensees consent for overlapping facilities must still be obtained should the Commission remove the prohibition on land-based transmitters for water-based licensees. ALLTEL also noted that the Commission should defer PCS licensing policies in the Gulf since PCS territories already include coastal areas.

The vast number of parties filing comments generally concur that the Commission should not proceed with a PCS licensing scheme at this time given the preexisting territorial rights which were conveyed in the PCS licenses secured at auction.³ Further, ALLTEL continues to believe, as do other commenters, that land-based PCS systems should be permitted to develop before definitive procedures are considered for the Gulf. The proposal of the American Petroleum Institute ("API") to reallocate PCS spectrum to private microwave service in the Gulf conflicts with this approach and appears to be an attempt to have the PCS spectrum revert to its prior use. API's approach should be rejected. Where it is not practical to provide PCS service in the Gulf, PCS licensees will not construct facilities and, in the absence of interference to or from PCS facilities, microwave incumbents may not be forced to move.

ALLTEL continues to believe that the Commission's proposal is the best way to bridge the gap between the Gulf and cellular licensees in a manner which best serves the

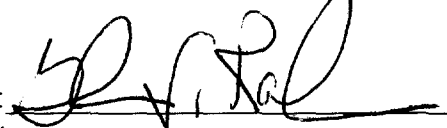
³ See generally Comments of PrimeCo Personal Communications, L.P.; Comments of Sprint Spectrum L.P. d/b/a Sprint PCS; Comments of BenBow PCS Ventures, Inc.; Comments of Aerial Communications, Inc. and Western PCS BTA I Corporation. Shell Offshore Service Company believes PCS should not be licensed in the Gulf because the spectrum is currently being used for private microwave facilities and there is no apparent need for PCS service in the Gulf. The rights of private microwave licensees in the Gulf, however, are secondary to the rights of the PCS licensee. Comments of Sprint Spectrum L.P. d/b/a Sprint PCS at page 6.

public interest. As noted by United States Cellular Corporation, "Achieving the maximum service to the public possible ought to be the Commission's guiding principle in the proceeding".⁴ Although ALLTEL has no objection to proposals to attach the coastal zone to the territories of land-based carriers⁵ it views the Commission's proposal as a workable compromise between the Gulf-based and land-based licensees which permits both types of licensee to take advantage of the efficiencies of expanding their existing systems to provide new public service expeditiously.

ALLTEL continues to agree with those commenters arguing that the service territories of land based licensees should continue to be protected.⁶

Respectfully submitted,

ALLTEL Communications, Inc.

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Dated: August 4, 1997

⁴ See Comments of United States Cellular Corporation at page 2.

⁵ See generally, Comments of AT&T Wireless Services, Inc. and Comments of BellSouth Corporation

⁶ See Comments of 360 Communications Company at page 8.

CERTIFICATE OF SERVICE

I, Michele D. Leftwich, certify that a copy of the foregoing COMMENTS OF ALLTEL TELEPHONE SERVICES CORPORATION ON PROPOSED RULEMAKING: CC DOCKET 90-6 was served this 4th day of August 1997, by U.S. first-class mail, postage prepaid, (unless otherwise noted) to the persons on the attached service list.


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